

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

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STAR NEWS DIGITAL MEDIA, INC.,  
MICHAEL PATRICK LEAHY,  
and MATTHEW D. KITTLE,

Plaintiffs,

v.

Case No. 3:23-cv-00467  
Judge Aleta A. Trauger

FEDERAL BUREAU OF INVESTIGATION,

Defendant.

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**DECLARATION OF MATTHEW D. KITTLE**

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I, Matthew D. Kittle, declare under the penalty of perjury that the following is true and correct:

1. I am a plaintiff in this action.
2. I am a journalist and have written for The Tennessee Star about the March 27, 2023, shooting at The Covenant School in Nashville.
3. I am working on a story concerning Audrey Hale's motivations for the March 27 shooting. Based on the information provided by FBI in this lawsuit, FBI has what MNPd referred to as a "manifesto," which reveals Hale's motivations for the shooting.
4. Although FBI now claims the manifesto consists only of documents found in Hale's car, I have consistently maintained that the "manifesto" includes documents reflecting the motivation for the shootings, irrespective of where the

documents were found. (See Paragraphs 14 and 16 of the Verified Complaint, and related attachments, describing my FOIA request.) At the time I made the FOIA request, I did not even know that documents were found in Hale's car.

5. To my knowledge, the documents obtained by law enforcement following the shooting are the only evidence of Hale's motivations for the shooting. Without seeing the documents that reveal Hale's motivations, I will be unable to report on those motivations and the public will be unable to learn of Hale's motivations.

6. On August 21, 2023, the Tennessee Legislature will sit in special session to consider gun control legislation in response to The Covenant shooting. Before adopting legislation to respond to the shooting, I believe the public has a right to know the motivations for the shooting. Legislation made in response to a shooting should be informed by the causes of the shooting, otherwise the public will not have a complete picture as to why the legislation is being considered, debated, and enacted. In short, documents revealing Hale's motivation are critical to inform the public related to the upcoming special session.

7. I understand that FBI may have to redact portions of records that do not reveal Hale's motivation or that may contain sensitive information that could interfere with public safety, a future prosecution, or privacy rights of third parties. I do not object to the appropriate redaction of the manifesto, and just like MNPD, I do not believe releasing the manifesto will impede any investigation or law enforcement proceeding.

Dated: 7/20/23

Matthew D. Kittle  
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